

T.T.C. Inc.



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QA 17952

August 4, 1993

Docket
MC-93-12

FHWA-97-2199-13

Mr. Jim Warren
Office of the Secretary of State
2701 South Dirksen Parkway
Springfield, Illinois 62723

Dear Mr. Warren:

Receipt of copies of pages 33874 - 33876 of the Federal Register for June 21, 1993 is acknowledged.

Secretary Ryan is aware that my perspective of safety has broadened, from the time when I operated a motor carrier to the present where the business of T.T.C., Inc. is furnishing employees to client companies. of the 20,400 employees furnished to customers, approximately 12,000 are drivers furnished to some 260 fleets and motor carriers.

With respect to the training of entry level drivers, I am satisfied that **with the model curriculum** which addresses all critical aspects of driver training, knowledge and skills testing to obtain a commercial driver's license, the required written examination and road test by using carriers and the annual review, there is sufficient redundancy to ensure emphasis on safe operation.

With respect to the questions for comment, each response shown below bears the same number as shown in the Federal Register.

1. Adequacy of training must be defined in terms of the number of persons trained who are **successful** in obtaining **employment** as drivers within a short time following such training, eg. 30 days. Such data is not presently communicated to any agency.
2. No standards currently are known to exist. With a shortage of **"good"** drivers, an interesting statistic would be the number of school graduates who are actually hired to drive **CMVs**; no reporting mechanism or record-keeping mechanism does not exist.
3. The Model **Curriculum** is satisfactory. A new driver may, however, need additional on-the-job training once hired; such additional training by the carrier would reflect its kind of operation and the equipment used.

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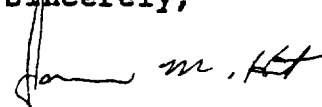
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4. **Yes.** When carriers hire new graduates, they **"approve"** by the decision to hire the training provided by the training institution.
5. Yes, but to **a** degree. Carrier operations vary with geography, product hauled and equipment used. Individual carrier input is needed.
6. No. Sufficient regulation currently exists. Additionally, liability and cargo insurers influence hiring requirements.
7. An **"entry level CMV driver"** is a driver who has just been hired to drive a commercial motor vehicle for the first time.
8. Requirements of the Federal **Motor** Carrier Safety Regulations and underwriting requirements of insurers in consonance with A.T.A. and state trucking organizations' programs provide sufficient influence.
9. Unknown
10. Not applicable. Since each carrier customer is itself required to comply with Federal Motor Carrier Safety Regulations as well as the underwriting standards of its insurers, qualifications of applicant's is a carrier decision.
11. Training opportunities vary from carrier to carrier.
12. Unknown. This employer is not in a position to make the desired observations.
13. T.T.C., Inc. favors safety training as frequently as the carrier's operation permits; at a minimum, a monthly training session is (or should be) expected. Training must, however, be worthwhile and a **"reward"** for attendance is recommended.

I hope that you find my observations to be helpful.

Sincerely,



James M. Hunt
Chairman and C.E.O.

JMH: keb

P.S. Please extend my personal regards to Secretary Ryan.

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